

1 EVAN C. BORGES, State Bar No. 128706

EBorges@GGTrialLaw.com

2 GREENBERG GROSS LLP

650 Town Center Drive, Suite 1700

3 Costa Mesa, California 92626

Telephone: (949) 383-2800

4 Facsimile: (949) 383-2801

5 Attorneys for Party-in-Interest and Appellant Erika Girardi

6
7
8 **UNITED STATES BANKRUPTCY COURT**

9 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**

10
11 In re

12 GIRARDI KEESE,

13 Debtor.

CACB Case No. 2:20-bk-21022-BR

Chapter 7

CACD Case No. 2:21-cv-06951-SVW

14 **STIPULATION AND [PROPOSED]**
15 **ORDER EXTENDING APPELLATE**
16 **DEADLINES FOR 30 DAYS**

Judge: Hon. Barry Russell

1 Party-in-Interest and Appellant Erika Girardi (“Appellant”), Appellee Elissa D. Miller,
2 Chapter 7 trustee (“Appellee”), and the Law Offices of Ronald Richards & Associates, APC,
3 (“Richards”) (collectively the “Parties”), by and through their undersigned counsel, and subject to the
4 approval of this Court, enter into this *Stipulation and [Proposed] Order Extending Appellate*
5 *Deadlines for 30 Days* (“Stipulation”), the purpose of which is to extend pending appellate deadlines
6 for thirty (30) days, and specifically, to extend the upcoming deadline for Appellee to designate any
7 additional record and provide a supplemental statement of issues on appeal from September 22, 2021
8 to October 22, 2021.

9 This Stipulation is based on the following facts:

10 1. On August 25, 2021, Appellant filed her Notice of Appeal and Statement of
11 Election with the Clerk of the Bankruptcy Court in the above entitled action with Case No. 2:20-
12 bk-21022-BR, thereby appealing this Court’s August 11, 2021 Order and concurrently filed
13 Memorandum of Decision Denying Party-in-Interest Erika Girardi’s Motion for Reconsideration
14 of Order Granting Chapter 7 Trustee’s Application to Employ the Law Offices of Ronald Richards
15 & Associates, A.P.C. as Special Litigation Counsel (the “Appeal”).

16 2. On September 8, 2021, Appellant filed her Designation of Record, Statement of
17 Issues on Appeal, and Notice Regarding the Ordering of Transcripts with the Clerk of the
18 Bankruptcy Court.

19 3. The Parties, through counsel, have met and conferred about the Appeal, including
20 on August 31, 2021 and September 24, 2021. In these discussions, to facilitate a potential
21 consensual resolution of the issues raised by the Appeal, the Parties agreed to continue all current
22 and pending deadlines related to the Appeal by thirty (30) days. Specifically, the next deadline is
23 on September 22, 2021, for Appellee to file a supplemental designation of record and
24 supplemental statement of issues related to the Appeal, which the Parties have agreed to extend to
25 October 22, 2021.

26 4. Based on the foregoing, the Parties to this Stipulation hereby stipulate and agree to
27 extend the deadline to file a supplemental designation of record and statement of issues to October
28 22, 2021.

1 IT IS SO STIPULATED.

2
3 DATED: September 21, 2021

GREENBERG GROSS LLP

4
5 By: 

Evan C. Borges

6 Attorneys for Party-in-Interest and Appellant Erika
7 Girard

8 DATED: September ____, 2021

SMILEY WANG-EKVALL, LLP

9
10
11 By: _____

Phillip E. Strok

12 Kyra E. Andrassy

13 Timothy W. Evanston

14 Attorneys for Appellee Elissa D. Miller, Chapter 7
Trustee

15 DATED: September 21, 2021

LAW OFFICES OF RONALD RICHARDS &
16 ASSOCIATES, APC

17
18 By: 

19 Ronald Richards

1 IT IS SO STIPULATED.

2
3 DATED: September ___, 2021

GREENBERG GROSS LLP

4
5 By: _____

Evan C. Borges

6 Attorneys for Party-in-Interest and Appellant Erika
7 Girard

8 DATED: September 21, 2021

SMILEY WANG-EKVALL, LLP

9
10
11 By:  _____

Phillip E. Strok

12 Kyra E. Andrassy

13 Timothy W. Evanston

14 Attorneys for Appellee Elissa D. Miller, Chapter 7
Trustee

15 DATED: September ___, 2021

LAW OFFICES OF RONALD RICHARDS &
16 ASSOCIATES, APC

17
18 By: _____

19 Ronald Richards

[PROPOSED] ORDER

Pursuant to the Stipulation for Order Extending Appellate Deadlines for 30 Days, and good cause appearing, IT IS HEREBY ORDERED that:

1. The deadline to file a supplemental designation of record and supplemental statement of issues is extended from September 22, 2021 to October 22, 2021.

###

Barry Russell
United States Bankruptcy Judge

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

650 Town Center Drive, Suite 1700
Costa Mesa, CA 92626

A true and correct copy of the foregoing document entitled (*specify*): **STIPULATION AND [PROPOSED] ORDER EXTENDING APPELLATE DEADLINES FOR 30 DAYS** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On **September 21, 2021**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On **September 21, 2021** I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **September 21, 2021**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 21, 2021 Cheryl Winsten
Date Printed Name


Signature

In re GIRARDI KEESE
Case No. 2:20-bk-21022-BR
U.S.B.C. Central District of California
Los Angeles Division

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING:

The following is the list of **parties** who are currently on the list to receive email notice/service for this case.

- **Kyra E Andrassy** kandrassy@swelawfirm.com,
lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- **Rafey Balabanian** rbalabanian@edelson.com, docket@edelson.com
- **Michelle Balady** mb@bedfordlg.com, leo@bedfordlg.com
- **Ori S Blumenfeld** ori@marguliesfaithlaw.com,
Helen@MarguliesFaithLaw.com;Angela@MarguliesFaithLaw.com;Vicky@MarguliesFaithLaw.com
- **Evan C Borges** eborges@ggtriallaw.com, cwinsten@ggtriallaw.com
- **Richard D Buckley** richard.buckley@arentfox.com
- **Marie E Christiansen** mchristiansen@vedderprice.com,
ecfladocket@vedderprice.com,marie-christiansen-4166@ecf.pacerpro.com
- **Jennifer Witherell Crastz** jcrastz@hrhlaw.com
- **Ashleigh A Danker** Ashleigh.danker@dinsmore.com,
SDCMLFiles@DINSMORE.COM;Katrice.ortiz@dinsmore.com
- **Clifford S Davidson** csdavidson@swlaw.com, jlanglois@swlaw.com;cliff-davidson-7586@ecf.pacerpro.com
- **Lei Lei Wang Ekvall** lekvall@swelawfirm.com,
lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- **Richard W Esterkin** richard.esterkin@morganlewis.com
- **Timothy W Evanston** tevanston@swelawfirm.com,
gcruz@swelawfirm.com;lgarrett@swelawfirm.com;jchung@swelawfirm.com
- **Jeremy Faith** Jeremy@MarguliesFaithlaw.com,
Helen@MarguliesFaithlaw.com;Angela@MarguliesFaithlaw.com;Vicky@MarguliesFaithlaw.com
- **James J Finsten** , jimfinsten@hotmail.com
- **Alan W Forsley** alan.forsley@flpllp.com, awf@fkllawfirm.com,awf@fl-lawyers.net,addy.flores@flpllp.com

- 1 • **Eric D Goldberg** eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com
- 2 • **Andrew Goodman** agoodman@andyglaw.com,
3 Goodman.AndrewR102467@notify.bestcase.com
- 4 • **Suzanne C Grandt** suzanne.grandt@calbar.ca.gov, joan.randolph@calbar.ca.gov
- 5 • **Steven T Gubner** sgubner@bg.law, ecf@bg.law
- 6 • **Marshall J Hogan** mhogan@swlaw.com, knestuk@swlaw.com
- 7 • **Sheryl K Ith** sith@cookseylaw.com, sith@ecf.courtdrive.com
- 8 • **Razmig Izakelian** razmigizakelian@quinnemanuel.com
- 9 • **Lillian Jordan** ENOTICES@DONLINRECANO.COM,
10 RMAPA@DONLINRECANO.COM
- 11 • **Lewis R Landau** Lew@Landaunet.com
- 12 • **Daniel A Lev** dlev@sulmeyerlaw.com,
13 ccaldwell@sulmeyerlaw.com;dlev@ecf.inforuptcy.com
- 14 • **Elizabeth A Lombard** elombard@zwickerpc.com, bknotices@zwickerpc.com
- 15 • **Craig G Margulies** Craig@MarguliesFaithlaw.com,
16 Vicky@MarguliesFaithlaw.com;Helen@MarguliesFaithlaw.com;Angela@MarguliesFaithlaw.com
- 17 • **Ron Maroko** ron.maroko@usdoj.gov
- 18 • **Peter J Mastan** peter.mastan@dinsmore.com,
19 SDCMLFiles@dinsmore.com;Katrice.ortiz@dinsmore.com
- 20 • **Edith R. Matthai** ematthai@romalaw.com, lrobie@romalaw.com
- 21 • **Kenneth Miller** kmiller@pmcos.com, efilings@pmcos.com
- 22 • **Elissa Miller (TR)** CA71@ecfcbis.com,
23 MillerTrustee@Sulmeyerlaw.com;C124@ecfcbis.com;ccaldwell@sulmeyerlaw.com
- 24 • **Eric A Mitnick** MitnickLaw@aol.com, mitnicklaw@gmail.com
- 25 • **Scott H Olson** solson@vedderprice.com, scott-olson-
26 2161@ecf.pacerpro.com,ecfsfdocket@vedderprice.com,nortega@vedderprice.com
- 27 • **Carmela Pagay** ctp@lnbyb.com
- 28 • **Leonard Pena** lpena@penalaw.com,
penasomaecf@gmail.com;penalr72746@notify.bestcase.com
- **Michael J Quinn** mquinn@vedderprice.com, ecfladocket@vedderprice.com,michael-quinn-2870@ecf.pacerpro.com

- **David M Reeder** david@reederlaw.com, secretary@reederlaw.com
- **Ronald N Richards** ron@ronaldrichards.com, morani@ronaldrichards.com
- **Kevin C Ronk** Kevin@portilloronk.com, Attorneys@portilloronk.com
- **Frank X Ruggier** frank@ruggierlaw.com, enotice@pricelawgroup.com
- **William F Savino** wsavino@woodsoviatt.com, lherald@woodsoviatt.com
- **Kenneth John Shaffer** johnshaffer@quinnemanuel.com
- **Richard M Steingard** , awong@steingardlaw.com
- **Philip E Strok** pstrok@swelawfirm.com,
gcruz@swelawfirm.com;lgarrett@swelawfirm.com;jchung@swelawfirm.com
- **Boris Treyzon** bt@treyzon.com, sgonzales@actslaw.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov
- **Eric D Winston** ericwinston@quinnemanuel.com
- **Christopher K.S. Wong** christopher.wong@arentfox.com, yvonne.li@arentfox.com
- **Timothy J Yoo** tjy@lnbyb.com

2. SERVED BY UNITED STATES MAIL:

Debtor:

Girardi Keese
1126 Wilshire Blvd
Los Angeles, CA 90017

ABIR COHEN TREYZON SALO, LLP, a California limited liability partnership (ACTS)
16001 Ventura Boulevard, Suite 200
Encino, CA 91436

Donlin, Recano & Company
6201 15th Ave
Brooklyn, NY 11219

IDiscovery Solutions
535 Anton Blvd Ste 850
Costa Mesa, CA 92626

James W Spertus
Spertus Landes & Umhoffer LLP
1990 South Bundy Dr Ste 705
Los Angeles, CA 90025

1 Neil Steiner
Steiner & Libo, Professional Corp
2 11845 W. Olympic Blvd Ste 910W
3 Los Angeles, CA 90064

4 Boris Treyzon Esq
16001 Ventura Blvd., Suite 200
5 Encino, CA 91436

6 Andrew W Zepeda
7 Lurie, Zepeda, Schmalz, Hogan & Martin
1875 Century Park East Ste 2100
8 Los Angeles, CA 90067

9
10 **3. SERVED BY PERSONAL DELIVERY:**

11 **U.S. Bankruptcy Court:**
U.S. Bankruptcy Court
Hon. Barry Russell
12 255 E. Temple Street, Suite 1660
13 Los Angeles, CA 90012
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28